



Cambridge
Community
Television

The Voice and Vision of Cambridge

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Channels 8, 9, & 96
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August 1, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Cambridge Public Access Corporation, d/b/a Cambridge Community Television, submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Cambridge Community Television (CCTV) serves the city of Cambridge Massachusetts. We operate three community cable channels, a computer lab and gallery, run a year-round youth media program and a citizen journalism initiative.

CCTV delivers approximately 24,000 hours of programming annually to 35,000 cable-subscribing homes. We carry a number of close captioned programs, including the very popular Democracy Now! The onscreen video programming guide of our multichannel video programming distributor, Comcast, does not provide a label or symbol indicating that this program has closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. During each re-licensing with Comcast, we have requested that our programming be included in their on-screen guides, but Comcast has refused. The level of information about our program options is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,

Susan Fleischmann
Executive Director